

It is first noted that although indicated as rejected on page 1 of the Official Action, no rationale is provided for the asserted rejection of claim 55. Accordingly, withdrawal of the final rejection is respectfully requested.

Claims 1-7, 11, 13-15, 19-21, 25-31, and 35-40 stand rejected under 35 USC § 103(a) as obvious over Chang et al. (U.S. Patent No. 5,884,288) in view of Sharpe et al. (U.S. Patent No. 5,222,018). Claims 7, 25-26 and 36-37 also stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Pintsov et al. (U.S. Patent No. 5,612,889). Claims 11 and 30 also stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Mersky et al. (U.S. Patent No. 6,119,106). Claims 13-14 and 39 also stand rejected under 35 USC § 103(a) as obvious over the base combination in further view of Anderson et al. (U.S. Patent No. 6,021,202). Claim 15 also stands rejected under 35 USC § 103(a) as obvious over the base combination in further view of Anderson et al. (U.S. Patent No. 6,021,202) and Hilt et al. (U.S. Patent No. 5,465,206). As understood, claims 51-54 stand rejected over the base combination in further view of an Official Notice taken by the Examiner. The rejections are respectfully traversed.

The arguments filed on February 8, 2001 are incorporated herein in their entirety.

The Examiner now relies generally on Chang's Abstract as disclosing an electronic bill payment system which receives respective sets of payment requests, each set corresponding to an associated set of payors requesting payments to a plurality of payees, as required by each of the independent claims. However, this position completely ignores the explicit disclosure in Chang's detailed description (see, for example, column 4, lines 44-51) in which Chang teaches that the described

system only receives payment requests directly from the associated payor. It is respectfully submitted that Chang lacks any suggestion of receiving sets of payment requests as required by the independent claims.

Further, there is nothing in the Abstract of Chang to suggest that payment requests from a set of payor's are received as a set of payment requests as required. Chang's Abstract does not even address how the referenced payment requests are received. Moreover, Chang fails to in any way recognize the advantage of receiving payment requests from a set of payees for different payors as a set of payment requests. This is not surprising, since Chang processes each payment request from a payee separately to generate a separate single check to each payee for payment by each payor (see Abstract). Hence, Chang has also failed to recognize the benefit of consolidating payments and accordingly would have no reason to consider receiving payment requests from multiple payors as a set. In fact, receipt of requests from multiple payors in a set would presumably require more work on the part of Chang's system without any corresponding benefit. Chang does not even disclose that the described system is capable of receiving a set of payment requests for different payees from a single payor, making the Examiner's conclusion that Chang describes a system capable of receiving a set of payment requests for different payees from multiple payors even more implausible.

Other features recited in the dependent claims are believed to further and independently distinguish over the applied art combinations. Such features include, but are not necessarily limited to, the following.

Claims 2, 3, 21, and 42-43 require that differently formatted sets of payment request be normalized. The Examiner relies on Chang, column 9, lines 1-12, as disclosing such

normalization. However, Chang (see column 8, lines 56-67) explicitly discloses that the format of the received payment request information is predefined by the recipient bank and therefore is always the same. Hence, Chang does not receive differently formatted sets of payment request, and thus has no need to normalize differently formatted sets of payment requests as required by the claims.

Claims 7, 25-27, 36-38 and 47 require that payment information be used to identify an eleven-digit zip code, and that the identified zip code be used to access or retrieve a payee record. The Examiner relies on Pintsov (column 7, lines 49-52) as disclosing the processing of payment information to identify a zip code. However, in the referenced text, Pintsov discloses altering the stored zip code due to an address change, not processing payment information to identify an eleven-digit zip code which is then used to access or retrieve a payee record. Accordingly, the Examiner's rationale is not understood.

The Examiner argues that it was obvious to use Pintsov's zip "to facilitate the delivery of payment data to a user specific address". As noted above, the claims require that payment information be used to identify an eleven-digit zip code, and that the identified zip code then be used to access or retrieve a payee record. Hence, one can only ask, what "payment data", what "user" and what "specific address" the Examiner is referring to. Further, where is the teaching within the applied combination to first identify a zip from payment information and then use this identified zip to access or retrieve a payee record?

Pintsov only discloses using a destination code (e.g. a stored zip code) based on a unique identifier (which is explicitly taught not to be a zip code) and altering the stored zip code if there has been an address change. Thus, the

relevance of Pintsov's teachings on which the Examiner relies cannot be understood.

Claims 11, 28-30, 40 and 48 require identifying characters of an account number or processing a received account number to select or identify a single delivery point to which payment is directed. The Examiner now points to Mersky (column 9, lines 8-67) as disclosing "scanning the customer's information (account number) and sending said information for processing". On this basis, the Examiner concludes that it would have been obvious to modify Chang to identify characters of an account number or process a received account number to select or identify a single delivery point to which payment is directed as required by the claims. Here again, the Examiner's rationale is not understood.

The referenced text lacks any disclosure of identifying scanned characters of an account number to select or identify a single delivery point to which payment is directed, or processing a scanned account number to select or identify a single delivery point to which payment is directed. Further, it is respectfully submitted that the asserted conclusion is unsupported by any disclosure within the applied combination of art, and the rejection is at best based on either mere speculation or a hindsight reconstruction of the present invention.

Claims 13-15, 31, 39 and 49, require transforming the account number included in a payment request into an altered account number according to the alteration rules. The Examiner points to Anderson (column 10, line 55, through column 11, line 13), as disclosing the required altering of an account number. As discussed in detail in the immediately prior response, the referenced text of Anderson discloses that documents are designed to comply with existing customs, protocols and legal

rules. Anderson does not in any way suggest that there is any alteration of the received data.

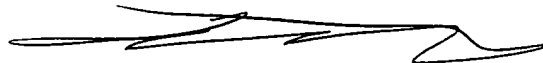
Claims 51-55 are rejected, inter alia, based on the Examiner's Official Notice that consolidating payment requests is old and well known in the electronic bill presentment art. The Examiner's position is not understood. Notwithstanding, the fact that this application has been in prosecution for approximately 3.5 years without disposition and the Examiner has been unable, over this extensive prosecution period, to uncover any art which explicitly (or for that matter implicitly) discloses the receipt of payment requests from a set of payors for multiple payees as a set (e.g. a set of consolidated payment requests), the Examiner now contends that such a feature was sufficiently well known to be the subject of Official Notice. Applicant's representative disagrees and requests that, to the extent the rejection will be maintain, the Examiner produce and apply art, which will support the Official Notice taken.

Once again, noting the extensive period of prosecution, including withdrawal of a prior final Official Action based on the filing of an Appeal Brief, Applicant's representative respectfully request that he be contacted to discuss this case before an Advisory Action issue.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed local telephone number, in order to expedite resolution of any remaining issues and further to expedite passage of the application to issue, if any further comments, questions or suggestions arise in connection with the application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0427 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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